

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 12 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
NICOLETTE SIGRID HORBACH, M.D. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply filed in relation to Nicolette Sigrid Horbach for Ethicon Wave 1, Dkt. 2044 (motion), Dkt. 2045 (memorandum in support) and Dkt. 2235 (reply). Plaintiffs respectfully request that the Court exclude Nicolette Sigrid Horbach's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 28, 2019

Respectfully submitted,

/s/ D. Renee Baggett
Renee Baggett, Esq.
Bryan F. Aylstock, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell
THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com

EXHIBIT A

Blake, Wendy	2:17-cv-01896
Brown, Wanda	2:13-cv-11267
Cameron, Angela	2:13-cv-22420
Foster, Kimberly Fromm	2:14-cv-02945
Leavitt, Jacinta	2:14-cv-01655
Schmalz, Tammy Lyne	2:16-cv-11039
Vigneau, Christine	2:17-cv-04364

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett _____
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com